

# **EXHIBIT 1**

Will Grannis  
October 29, 2020

1

1 - WILL GRANNIS -

2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 ----- X  
5 ULKU ROWE,

6 Plaintiff,

7 Case No.  
8 19 Civ. 08655 (LGS) (GWG)

9 v.

10 GOOGLE LLC

11 Defendant.

12 ----- X

13 DATE: October 29, 2020

14 TIME: 11:33 A.M.

15 VIDEOTAPED VIDEOCONFERENCE DEPOSITION

16 OF WILL GRANNIS, held via Zoom, pursuant to

17 Notice, before Hope Menaker, a Shorthand Reporter

18 and Notary Public of the State of New York.

- WILL GRANNIS -

time.

Q. Do you recall what your level was?

A. L 8.

Q. Do you recall what job ladder that was in?

A. Program management.

Q. When was your start date?

A. It was the end of March, '2015 approximately.

Q. And how long were you in that role?

A. It was roughly a year.

Q. And where did you go next?

A. My next role was starting the office of the CTO.

Q. And how did it come to be that you made a move into the office of the CTO?

A. I was asked to formulate -- because of my background in enterprise technology both in startups and in large enterprises, I was asked to provide thoughts and opinions to leadership around building such a function.

And at the time I was told based on high performance in the role, demonstrated knowledge of the products and, you know,

1 - WILL GRANNIS -

2 firsthand -- real firsthand experience whether it  
3 was hands-on or leadership that we would make -- I  
4 was offered to start this role up and at the time  
5 it was scoped to be a very small thing and an  
6 experimental function.

7 Q. What was the title or descriptive  
8 title of that role?

9 A. Director, office of the CTO.

10 Q. Did that role include an engineering  
11 component?

12 A. Yes, the -- eventually. So part of  
13 creating a team was -- actually was also creating  
14 the -- the features of the -- the function itself.  
15 It was a new function at Google.

16 Q. And did that function gain a name?

17 A. Yes.

18 Q. And what was the name?

19 A. The Office of the CTO was the name of  
20 the group and the function, we decided to utilize  
21 a technical job family that had been used  
22 elsewhere in Google and put it in engineering for  
23 the first time.

24 Q. What do you mean, "put it in  
25 engineering"?

1 - WILL GRANNIS -

2 A. Our job families can exist. So the  
3 job family that was used for the office of the CTO  
4 had certain elements that we wanted to bring  
5 across and we knew that engineering, the core of  
6 the team would be critical to have engineering  
7 skills.

8 And so we took the features of a job  
9 that allowed for a blend of customer facing,  
10 customer impact-type work, plus engineering-type  
11 work and we put it in engineering, meaning it was  
12 in the engineering hierarchy which allow the  
13 members of the team to participate in the larger  
14 engineering organization whether that was, you in,  
15 you know, developing or in more engineering-like  
16 reviews.

17 Q. Was -- the technical job family  
18 you -- you talked about, was that technical  
19 solutions consultant?

20 A. Yes.

21 Q. And so there were technical solutions  
22 consultants outside of OCTO at the time you  
23 adopted that title?

24 A. We don't -- we don't refer to  
25 technical solutions consultant and the job family

1 - WILL GRANNIS -

2 detail, so it will probably help. OCTO, the job  
3 family as seen in the job description and in OCTO  
4 as we've described since the very beginning of the  
5 CTO office, the role consists of three main we'll  
6 call them buckets of work. There's customer work,  
7 there's influencing the platform and products, and  
8 then there is the speaking, the evangelism part.

9 In order to create impact with the  
10 customer OCTOs are expected to help materially  
11 advance the progress of the largest brands in the  
12 world; and what I mean by that is, you know, come  
13 to Cloud, come to Google Cloud and succeed with  
14 Google Cloud.

15 The second pillar, the engineering  
16 pillars, are expected to take their knowledge from  
17 the corporate world and what they obtain at Google  
18 and they're expected to show impact on the product  
19 road map, and this can come in a variety of  
20 fashions. Most often this means that they have  
21 championed a change that we need make to what  
22 we're building that it is accepted by the  
23 engineering, production, leadership.

24 And the third pillar is conveying the  
25 power of our technology to the outside world

1 - WILL GRANNIS -

2 and helping create a translation between our  
3 technology and its possibilities in the context of  
4 the day; and in this way Ulku for example spent  
5 most of her time explaining the power of  
6 technology to financial services organizations and  
7 regulators, organizations like that externally.

8 Q. So we'll come back to some of this.

9 With respect to the second bucket,  
10 influencing the platform products and the  
11 engineering piece -- do I have that right, that's  
12 the second bucket?

13 A. Yes.

14 Q. Describe for me a little bit more  
15 about the engineering aspect of -- of the role,  
16 what it means to impact -- have an impact on the  
17 product road map.

18 A. Examples of impact can range from  
19 conceiving of a design of a new product and  
20 ensuring that it's built. It can be spotting an  
21 opportunity to evolve something that we already  
22 have and make it better.

23 And it -- I think it's critical to  
24 point out that the idea itself is only a little  
25 bit of the role, that the -- the full as, you

1 - WILL GRANNIS -

2 Q. What was the context of that  
3 transfer; why was he being transferred?

4 MR. GAGE: Objection.

5 A. He wanted to lead a production  
6 engineering team, something we don't do in OCTO.

7 Q. So he was being transferred from the  
8 technical director Eng role into an SWE Eng role?

9 MR. GAGE: Objection.

10 A. I'm -- I'm just reading this again  
11 just cause I -- I've never seen this before.

12 Yes, TSE to SWE manager.

13 Q. And did you support this transfer?

14 A. Yes.

15 Q. And did you view his skills in TSC as  
16 transferrable to SWE?

17 MR. GAGE: Objection.

18 A. Some of them.

19 Q. And what skills are transferable?

20 A. It's more about the -- it's more  
21 about the job family, and let me explain. The job  
22 family -- technical solutions consultant, we  
23 described earlier the three pillars of this role.  
24 The pillars are customer, evangelism, and  
25 engineering. In the SWE ladder, software



1 - WILL GRANNIS -

2 engineering ladder, customer and evangelism aren't  
3 present in the pillar requirements.

4 So the skills that are transferable  
5 are engineering, but that ladder doesn't recognize  
6 the skills of large-customer advancement and  
7 evangelism as val -- as core valuable pieces of  
8 their job description.

9 Q. Are there aspects of the skills that  
10 someone would have with respect to Pillars 1 and 3  
11 in TSC that would be skills that could also be  
12 used with respect to a manager in SWE?

13 A. The three OCTO pillars, the first and  
14 third pillars would be largely negligible to  
15 transfer to a SWE manager.

16 Q. Understood. The pillars describe the  
17 responsibilities of the TSC, is that a fair way to  
18 characterize that?

19 MR. GAGE: Objection.

20 A. Responsibilities, skills, background,  
21 experience necessary, yes.

22 Q. Okay. So, for instance, thought  
23 leadership might be a skill that's relevant to the  
24 first and third pillars, correct?

25 MR. GAGE: Objection.

1 - WILL GRANNIS -

2 A. Mostly -- mostly the third, but  
3 ome -- somewhat in the first, yes.

4 Q. Okay. Do you see thought  
5 leadership and evangelism as interchangeable or as  
6 different -- different things?

7 MR. GAGE: Objection.

8 A. They are slightly different skills.  
9 Thought leadership is the ability to take a  
10 situation, use experience, knowledge, what you  
11 learn and be able to advance a -- a situation or  
12 an area that quite often others don't believe or  
13 don't agree with. Evangelism is purely the act of  
14 communicating externally on behalf of something.

15 Q. Okay. We looked earlier at that  
16 engineering levelling guide --

17 A. Uh-huh.

18 Q. -- do you recall that?

19 A. I do.

20 Q. With -- with respect to the items  
21 that were contained on the engineering levelling  
22 guide, and if you need to we can go back to that  
23 document, but is it your understanding that those  
24 items are items that apply both to TSCs and to  
25 SWEs?

1 - WILL GRANNIS -

2 MR. GAGE: Objection.

3 A. Somewhat, but that's also why we have  
4 job families that are more descriptive in terms of  
5 requirements.

6 Q. I want to make sure I'm directing  
7 you, give me one moment. Okay, let's go back and  
8 look at that. It's Exhibit 6.

9 A. Okay.

10 MR. GAGE: Is this already there  
11 or --

12 MS. GREENE: It's there.

13 MR. GAGE: Exhibit 6, Adam Lief, this  
14 one?

15 MS. GREENE: Yes.

16 A. I have it up.

17 Q. Okay. If we can look at the  
18 last -- Page 2, the entries for Level 8 and Level  
19 9, are there any entries there that you would say  
20 do not apply to technical directors?

21 MR. GAGE: Objection.

22 A. And was the question are there any  
23 that don't explicitly apply?

24 Q. That you would say well, this isn't  
25 relevant with respect to the TSC ladder or roles.

1 - WILL GRANNIS -

2 A. None that immediately jump out as  
3 defined.

4 Q. Okay, and with respect to a SWE, are  
5 there any here that you would say as far as you  
6 understand the role of SWE do not apply to SWE?

7 MR. GAGE: Objection.

8 A. In the category of leadership, I  
9 think that these would -- these would apply.

10 Q. Okay. Well, just so I'm clear: If we  
11 go all the way back up to Page 1, there's four  
12 levelling criteria; knowledge and experience,  
13 complexity and scope, leadership and influence,  
14 and organizational impact. Do you see that?

15 A. I do.

16 Q. Okay. So with respect to Levels 8  
17 and 9, do each of those categories in this  
18 document apply to SWE?

19 A. Well, it says just up in the header  
20 "It's not a representation of expectations for any  
21 specific ladder," so I think the answer is no.

22 Q. So I'm asking you based on what you  
23 know about the SWE role and as you've observed it  
24 in operation, do these generally describe  
25 attributes of someone at the Level 8 and/or Level

1 - WILL GRANNIS -

2 OCTO?

3 A. Yes.

4 Q. Do you know who Jonathan Donaldson  
5 is?

6 A. Yes.

7 Q. Is he another person who you hired  
8 into the technical director position in OCTO, that  
9 position we saw in the job description we looked  
10 at earlier?

11 A. Yes.

12 Q. What about Paul Strong, do you know  
13 who he is?

14 A. Yes.

15 Q. Is he someone else you hired as a  
16 technical director within OCTO?

17 A. Yes.

18 Q. And I -- I still have not figured out  
19 how to say his name, Evren Eryurek?

20 A. Eryurek.

21 Q. Yes. Is he another person that you  
22 hired in as a technical director within OCTO?

23 A. Yes.

24 Q. Now, at some point did Evren transfer  
25 to a PM ladder?

October 29, 2020

122

1 - WILL GRANNIS -

2 A. When he left OCTO he went into a  
3 probationary product management role, that's  
4 correct.

5 Q. PM stands for Product Management?

6 A. Yes.

7 Q. So he had skills that were  
8 transferable from TSC to PM?

9 A. That's why he was put in a  
10 probationary period, was to determine whether that  
11 was true or not.

12 Q. And do you know the outcome of that?

13 A. He's a product manager today, so...

14 Q. Okay, and with respect to the  
15 engineering levelling guide that we looked at a  
16 bit ago with respect to Levels 8 and 9 in those  
17 four different categories for the PM manager role  
18 as you observed it at Google, do these descriptors  
19 apply to that ladder?

20 A. Generally, yes, but again as states  
21 in the doc it doesn't represent the specific  
22 expectations for any job role including PM, SWE,  
23 or TSC.

24 Q. Right. This is an Engineering-Wide  
25 Levelling Guide?

1 - WILL GRANNIS -

2 A. Yeah, this is -- yeah, there's an  
3 engineering category of jobs and then the job  
4 families, so this is for an engineering category  
5 of jobs.

6 Q. So this is the -- the broader set and  
7 then an individual ladder may have its own levels  
8 defined as well, correct?

9 A. Yes.

10 Q. And so earlier we looked at this when  
11 we discussed the TSC ladder itself was well,  
12 correct?

13 A. Yes.

14 Q. All right. Do you know a woman or  
15 aware of a woman named REDACTED ?

16 A. Yes.

17 Q. And how are you aware of her?

18 A. She was being considered for a role  
19 in OCTO.

20 Q. And was she offered a role?

21 A. She was.

22 Q. And do you recall at what level she  
23 was offered a role?

24 A. I think it was L 9, but I'm not a  
25 hundred percent sure.

1 - WILL GRANNIS -

2 that into another role there's always going to be  
3 pieces that are applicable and pieces that aren't;  
4 and in our case, we index heavily towards  
5 engineering in OCTO. That's why we took the job  
6 family and moved to it engineering. That's why we  
7 have many, many hiring steps around validating  
8 technical skills. That's why over time it's one  
9 of the priorities for people within the team.

10 And considering that Tariq was  
11 building an organization that was in sales, a  
12 sales or a business development-like function, my  
13 assumption was that the engineering pieces of what  
14 we do might be a little bit devalued, and since  
15 that's such a core of OCTO, there was certainly  
16 going to be some of that same translation  
17 difficulty.

18 Q. Did you have a conversation with Mr.  
19 Shaukat about the vertical lead?

20 A. Not directly.

21 Q. Did you have a conversation with Mr.  
22 Stevens about the vertical lead around this time?

23 A. I presented my opinions.

24 Q. And did you present Mr. Stevens with  
25 an opinion with respect to Ms. Rowe's



1 - WILL GRANNIS -

2 leans hire, would you have recommended hire for  
3 the role?

4 MR. GAGE: Objection.

5 A. I -- I would have needed -- yeah, I  
6 would have needed to know more about the roles.

7 As I stated earlier I never saw a job  
8 description. I never saw a key criteria. I never  
9 saw any of the things that would allow me to make  
10 a specific recommendation.

11 Q. Based on -- did I understand your  
12 testimony earlier with respect to the pillars and  
13 Ms. Rowe's general performance, that you  
14 considered her to be strong on the -- the business  
15 side with respect to financial services?

16 A. A little more specifically I -- we  
17 should we should definitely check, but what I  
18 wanted to make sure was articulated is that the  
19 three pillars of OCTO are not business -- there's  
20 no business pillar. There's a customer pillar,  
21 there's a technical engineering pillar, and then  
22 there's an evangelism pillar.

23 Evangelism has been Ulku strongest  
24 area throughout her time, but I was her manager  
25 and that's recorded in performance reviews.

1 - WILL GRANNIS -

2 The pillar that would come next in  
3 terms of performance level would be the customer,  
4 but that's not necessarily dependent on business  
5 savvy, sales savvy, business development savvy;  
6 it's actually based on understanding problems in  
7 that industry of a general technology nature.

8 And then the third bucket of  
9 engineering is the area where she's had the lowest  
10 performance consistently over the three years,  
11 three-plus years.

12 Q. And that customer component includes  
13 understanding the underlying business of the  
14 customer, in this case financial services; is  
15 that -- am I right about that?

16 A. Somewhat, but that is not the  
17 extensive requirement. The difference between an  
18 OCTO role for example and a position that's in a  
19 sales or business development just -- remember  
20 when we talked about the -- kind of the job  
21 umbrellas or the job categories earlier; we had  
22 engineering, we had sales, you know, we had  
23 administrative, general administrative. Those are  
24 the three types.

25 In sales there's higher emphasis on

1 - WILL GRANNIS -

2 Q. -- or did the people you evaluated  
3 fall within a certain category?

4 A. I'd have to look at the --

5 MR. GAGE: Objection.

6 A. I'd have to look at the data to give  
7 you a definitive answer.

8 Q. Was a 5 a regular occurrence or would  
9 that be more unusual for someone to be 4 to 5?

10 A. Statistically the least likely  
11 ratings are the poles, as you would expect  
12 the -- the extremes, the needs improvement, and  
13 the superbs.

14 Q. Did Google apply any sort of Bell  
15 Curve to -- or fourth-ranking process to its  
16 evaluation rankings?

17 A. No, people were allowed to earn the  
18 score that they earned.

19 Q. With respect to Ms. Rowe's  
20 performance evaluation that you completed, were  
21 you accurate or did you strive to be accurate in  
22 terms of the feedback and assessment that you  
23 provided in those reviews?

24 A. Yes, it's absolutely critical for the  
25 functioning of the team; and as an example Ulku

1 - WILL GRANNIS -

2 performed well in the one-to-one and one-to-many,  
3 but did not perform well in engineering which is  
4 why her rating was not higher.

5 Q. Did she do anything on that pillar?

6 MR. GAGE: Objection.

7 A. I'd have to --

8 MR. GAGE: In this particular year or  
9 ever?

10 MS. GREENE: Ever.

11 A. Very little. Consistently if you  
12 look over the span of her performance years,  
13 you'll notice a very consistent pattern and that  
14 is a lack of meaningful impact in engineering.

15 In her late -- latest performance  
16 review which we just actually had this week it was  
17 pointed out that she has started some efforts that  
18 might be promising, but we don't grade on intent,  
19 we grade on impact and Ulku has yet to demonstrate  
20 any significant impact in the engineering pillar.

21 Q. And what -- you mentioned in this  
22 year's review, what -- what review did you give in  
23 this last have evaluation, what scores?

24 A. I think exceeds expectations. An  
25 OCTO is limited in their ability to score high

1 - WILL GRANNIS -

2 on -- on the rating if they're not fulfilling one  
3 of the pillars on the job.

4 Q. Give me just a moment.

5 Okay. After Ms. Rowe joined Google,  
6 did she raise concerns with you about her level?

7 A. The time when I remembered most  
8 specifically was in the transition to the vertical  
9 organization, when she was asking about the  
10 correspondence that we -- that we talked about  
11 earlier.

12 Q. Are you aware that in the fall of  
13 2018, she raised with Kevin Lucas and Melissa  
14 Lawrence concerns about her levelling and that men  
15 had been leveled higher than her?

16 MR. GAGE: Objection.

17 A. I'm -- I'm not aware of the timing or  
18 the nature of the concerns, but I am aware because  
19 I had a discussion with employee relations that  
20 there was a general concern.

21 Q. When was that discussion with  
22 employee relations?

23 A. I don't remember off the top of my  
24 head.

25 Q. Was it after she was back in OCTO or